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11
12 **UNITED STATES DISTRICT COURT**
13
DISTRICT OF NEVADA

14
15 WILLIAM J. BERRY, JR.; CYNTHIA
FALLS; SHANE KAUFMANN,

16 Plaintiffs,

17 vs.

18 DESERT PALACE, INC. d/b/a CAESARS
PALACE; et al.,

19 Defendants.

20 Case No.: 2:17-cv-00019-GMN-PAL

21
22 **PLAINTIFFS' CHART OF
EXHIBITS FOR THEIR
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT, CONTAINED IN
THREE APPENDICES**

23
24 **APPENDIX 2**

Exhibit #	Description of Document	Appendix
1	William J. Berry Deposition Excerpts	3
2	William Berry NERC Charge of Discrimination dated 10/5/2006	1
3	Confidential Podium Notes	3

1	4	Incident Report, Cynthia Tobias	1
2	5	William Berry Faxed HR Complaint Dated 2/28/2006	1
3	6	William Berry Typed Statement to HR Dated 3/3/2006	1
4	7	Caesars Investigation Notes March 2006	1
5	8	Maureen DesChamps Statement to NERC	1
6	9	Affidavit of Maureen DesChamps	1
7	10	4/30/08 NERC Determination of Discrimination	1
8	11	William Berry Suspension Document	1
9	12	William Berry NERC Amended Charge 5/8/09	1
10	13	EEOC Affidavit of Antone Rodrigues	1
11	14	EEOC Onsite Interview of Dean Allen	1
12	15	EEOC Determination of Discrimination Regarding William Berry Dated 5/22/2015	1
13	16	EEOC Notice of Right to Sue Regarding William Berry Dated 9/29/2016	1
14	17	Cynthia C. Falls Deposition Excerpts	3
15	18	Transport Workers Union Letter Dated 1/25/2010	1
16	19	Harrah's Letter Dated 2/3/2010	1
17	20	Cynthia Falls EEOC Charge of Discrimination	2
18	21	Cynthia Falls 2010 Descriptions of Discrimination	3
19	22	Cynthia Falls 2012 Notes of Discrimination	3
20	23	Falls Notes, 2011, 2012	3
21	24	Falls Notes, 2014	3
22	25	Compilation of Employee Statements to EEOC	2
23	26	July 2014 Day Shift Dealers Discrimination	3

1	Complaint	
2	27 Cynthia Falls EEOC Charge of Discrimination Dated 7/23/2014	2
3		
4	28 Cynthia Falls Documented Coaching Dated 1/14/2014	2
5		
6	29 EEOC Determination of Discrimination Regarding Cynthia Falls	2
7		
8	30 Shane Kaufmann Deposition Excerpts	3
9		
10	31 Shane Kaufmann Memorandum Dated 2/24/10	2
11		
12	32 Shane Kaufmann Letter Dated 2/28/10	2
13		
14	33 Shane Kaufmann Charge of Discrimination Dated 10/19/2010	2
15		
16	34 Shane Kaufmann Handwritten Notes	3
17		
18	35 Shane Kaufmann Charge of Discrimination Dated 1/7/2014	2
19		
20	36 Shane Kaufmann Letter Dated 1/25/2012	2
21		
22	37 EEOC Determination of Discrimination Regarding Shane Kaufmann	2
23		
24	38 Documents Regarding Caesars Full Time Promotions	2
25		
26	39 Kimball Williams Deposition Excerpts	3
27		
28	40 Caesars Palace Internal Customer Arrangement Information	3
25	41 Caesars Table Games Investigation	3
26		
27	42 Emails Regarding Room B Customers	2
28		
25	43 Caesars Internal Emails Regarding Customers	3
26		
27	44 Maggie Gong Deposition Excerpts	3
28		

1	45	Affidavit of Cynthia Falls	3
2	46	Affidavit of Shane Kaufmann	2
3	47	Affidavit of Christopher Palmer	2
4	48	Affidavit of Stephanie Rose	2
5	49	Affidavit of Kellie Sesto	3
6	50	Affidavit of Pamela Duefrene	2
7	51	Nevada Gaming Board Investigation Documents	2
8	52	Declaration of William Berry	2
9	53	Caesars Rule 30(b)(6) Deposition Excerpts	3
10	54	William Berry Documented Coaching Dated 8/18/08	2
11	55	Employee Discipline History	3
12	56	Telephone Attendance Log	3
13	57	Declaration of Kathleen J. England	2

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18 Respectfully submitted this 15th day of February, 2019,

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 15th day of February, 2019, “PLAINTIFFS’ CHART
3 **OF EXHIBITS FOR THEIR OPPOSITION TO DEFENDANT’S MOTION FOR**
4 **SUMMARY JUDGMENT, CONTAINED IN THREE APPENDICES APPENDIX 2**
5 will be made through the CM/ECF electronic filing and service system, to all on the
6 service list, including:

7 Esther G. Lander
8 William J. Edelman
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16 By: /s/ Danielle Barraza

17 An Employee of MAIER GUTIERREZ & ASSOCIATES

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